	Case 2:09-cv-00957-KJD-PAL Document	134 Filed 08/02/12	Page 1 of 3		
1					
2	ROBERT B. GERARD, ESQ. Nevada Bar No. 5323				
3	RICARDO R. EHMANN, ESQ. Nevada Bar No. 10576				
4	GERARD & ASSOCIATES 2840 South Jones Boulevard				
5	Building D, Suite #4 Las Vegas, Nevada 89146 Talankana (702) 251 0002				
6	Telephone: (702) 251-0093 Facsimile: (702) 251-0094				
7	rgerard@gerardlaw.com rehmann@gerardlaw.com				
8	KYLE NORDREHAUG, ESQ. BLUMENTHAL NORDREHAUG &				
9	BHOWMIK 2255 Calle Clara				
10	La Jolla, California 92037 Telephone: (858) 551-1223				
11	Facsimile: (858) 551-1232				
12	Attorneys for Plaintiffs (Additional Attorneys on Signature Page)				
13					
14	UNITED STATES DISTRICT COURT				
	UNITED STATES	DISTRICT COURT	DISTRICT OF NEVADA		
15					
15 16	DISTRICT ADAM GOODMAN; JESSE BAHKSHIAN;	OF NEVADA			
15 16 17	DISTRICT		0957-KJD-PAL		
15 16 17 18	DISTRICT ADAM GOODMAN; JESSE BAHKSHIAN; EVAN and FRANCOISE CHERRY; SCOTT	OF NEVADA Case No: 2:09-cv-0 STIPULATION AN	ND ORDER OF		
15 16 17 18 19	ADAM GOODMAN; JESSE BAHKSHIAN; EVAN and FRANCOISE CHERRY; SCOTT HEYDEN; DAVID LEON,	OF NEVADA Case No: 2:09-cv-0	ND ORDER OF		
15 16 17 18 19 20	DISTRICT ADAM GOODMAN; JESSE BAHKSHIAN; EVAN and FRANCOISE CHERRY; SCOTT HEYDEN; DAVID LEON, Plaintiffs, v. PLATINUM CONDOMINIUM	OF NEVADA Case No: 2:09-cv-0 STIPULATION AN VOLUNTARY DIS	ND ORDER OF		
15 16 17 18 19	DISTRICT ADAM GOODMAN; JESSE BAHKSHIAN; EVAN and FRANCOISE CHERRY; SCOTT HEYDEN; DAVID LEON, Plaintiffs, v.	OF NEVADA Case No: 2:09-cv-0 STIPULATION AN VOLUNTARY DIS	ND ORDER OF		
15 16 17 18 19 20 21	ADAM GOODMAN; JESSE BAHKSHIAN; EVAN and FRANCOISE CHERRY; SCOTT HEYDEN; DAVID LEON, Plaintiffs, v. PLATINUM CONDOMINIUM DEVELOPMENT, LLC; MARCUS MANAGEMENT LAS VEGAS, LLC; and	OF NEVADA Case No: 2:09-cv-0 STIPULATION AN VOLUNTARY DIS	ND ORDER OF		
15 16 17 18 19 20 21 22	ADAM GOODMAN; JESSE BAHKSHIAN; EVAN and FRANCOISE CHERRY; SCOTT HEYDEN; DAVID LEON, Plaintiffs, v. PLATINUM CONDOMINIUM DEVELOPMENT, LLC; MARCUS MANAGEMENT LAS VEGAS, LLC; and MARCUS HOTELS, INC.,	OF NEVADA Case No: 2:09-cv-0 STIPULATION AN VOLUNTARY DIS	ND ORDER OF		
15 16 17 18 19 20 21 22 23	ADAM GOODMAN; JESSE BAHKSHIAN; EVAN and FRANCOISE CHERRY; SCOTT HEYDEN; DAVID LEON, Plaintiffs, v. PLATINUM CONDOMINIUM DEVELOPMENT, LLC; MARCUS MANAGEMENT LAS VEGAS, LLC; and MARCUS HOTELS, INC.,	OF NEVADA Case No: 2:09-cv-0 STIPULATION AN VOLUNTARY DIS	ND ORDER OF		
15 16 17 18 19 20 21 22 23 24	ADAM GOODMAN; JESSE BAHKSHIAN; EVAN and FRANCOISE CHERRY; SCOTT HEYDEN; DAVID LEON, Plaintiffs, v. PLATINUM CONDOMINIUM DEVELOPMENT, LLC; MARCUS MANAGEMENT LAS VEGAS, LLC; and MARCUS HOTELS, INC., Defendants.	OF NEVADA Case No: 2:09-cv-0 STIPULATION AN VOLUNTARY DIS PREJUDICE	ND ORDER OF SMISSAL WITH		
15 16 17 18 19 20 21 22 23 24 25	ADAM GOODMAN; JESSE BAHKSHIAN; EVAN and FRANCOISE CHERRY; SCOTT HEYDEN; DAVID LEON, Plaintiffs, v. PLATINUM CONDOMINIUM DEVELOPMENT, LLC; MARCUS MANAGEMENT LAS VEGAS, LLC; and MARCUS HOTELS, INC.,	Case No: 2:09-cv-0 STIPULATION AN VOLUNTARY DISPREJUDICE	ND ORDER OF SMISSAL WITH		

Case 2:09-cv-00957-KJD-PAL Document 134 Filed 08/02/12 Page 2 of 3

1	Development, LLC, Marcus Management Las Vegas, LLC and Marcus Hotels, Inc.			
2	("Defendants"), collectively known herein as the parties ("Parties"), have executed a settlement			
3	agreement that fully and finally resolves all claims, disputes and differences in the above-			
4	captioned matter;			
5	IT IS HEDEDY LOINTH V STIDI	II ATED AND ACDEED by the Douting by and		
6	IT IS HEREBY JOINTLY STIPULATED AND AGREED by the Parties, by and			
7	through their respective attorneys of record and subject to the approval of the Court, that pursual			
8	to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, the above-captioned action is			
9	hereby dismissed with prejudice. Each party to this lawsuit shall bear his/its own attorneys' fees			
10	costs, and professional expenses incurred herein.			
11				
12	A calendar call in this matter is currently set for October 9, 2012 at 9:00 a.m., and a jury			
13	trial is scheduled to begin October 15, 2012.			
14	RESPECTFULLY SUBMITTED.			
15				
16	Dated this 30 th day of July, 2012.	Dated this 30 th day of July, 2012.		
17	GERARD & ASSOCIATES	FOLEY & LARDNER LLP		
18				
19	By: /s/ Ricardo Ehmann . Robert B. Gerard, Esq.	By: <u>/s/ <i>Brian Keenan</i></u> . Nancy J. Sennett, Esq.		
20	Nevada State Bar #005323	David Lucey, Esq.		
21	Ricardo R. Ehmann, Esq. Nevada State Bar #010576	Brian P. Keenan, Esq. FOLEY & LARDNER LLP		
	2840 South Jones Blvd.	777 East Wisconsin Avenue		
22	Building D, Unit 4 Las Vegas, Nevada 89146	Milwaukee, Wisconsin 53202 Telephone: (414) 271-2400		
23	Telephone: (702) 251-0093	Facsimile: (414) 297-4900		
24	Facsimile: (702) 251-0094	(admitted pro hac vice)		
25	Kyle Nordrehaug, Esq.	ANDREW P. GORDON, ESQ.		
26	BLUMENTHAL NORDREHAUG & BHOWMIK	Nevada State Bar #3421 KRISTEN T. GALLAGHER, ESQ.		
27	2255 Calle Clara La Jolla, California 92037	Nevada State Bar #9561 McDONALD CARANO WILSON LLP		
28	Telephone: (858) 552-1223	2300 West Sahara Avenue, Suite 1000 Las Vegas, NV 89102		

Case 2:09-cv-00957-KJD-PAL Document 134 Filed 08/02/12 Page 3 of 3

I	Case 2:09-cv-00957-KJD-PAL Docu 	ment 134 Filed 08/02/12 Page 3 of 3
1 2 3 4 5 6 7	Facsimile: (858) 551-1232 Burton Wiand, Esq. Florida State Bar #407690 WIAND GUERRA KING LLC 3000 Bayport Drive, Suite 600 Tampa, FL 33607 Telephone: (813) 347-5100 Facsimile: (813) 347-5199 Attorneys for The Plaintiffs	Attorneys for Platinum Condominium Development, LLC, Marcus Management Las Vegas, LLC, and Marcus Hotels, Inc.
8		IT IS SO ORDERED:
9		II IS SO ORDERED.
10		
11		Bust)
12		UNITED STATES DISTRICT JUDGE
13		DATED: 8/2/12
14		DATED.
15		
16		
17		
18		
19		
20		
21 22		
23		
24		
25		
26		
27		